

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

THE GEO GROUP, INC.,)
v.)
Plaintiff,)
HINTON ECONOMIC)
DEVELOPMENT AUTHORITY, a)
Public Trust, and THE TOWN OF)
HINTON, OKLAHOMA,)
Defendants.)

Case No. CIV-23-1014-G

MOTION TO EXTEND SCHEDULING ORDER DEADLINES

COMES NOW the Plaintiff, The GEO Group, Inc. and respectfully moves the Court to extend all remaining deadlines within the current Scheduling Order (Doc. 18), by thirty (30) additional days. In support thereof, the Plaintiff shows the Court as follows:

1. This is a dispute over the extent of the contractual obligations, if any, between the Plaintiff, The GEO Group, Inc. and the Defendants, Hinton Economic Development Authority ("HEDA") and the Town of Hinton, Oklahoma. (See Doc. 1 & Doc. 7.)
2. Plaintiff filed this Complaint on November 21, 2023. (See Doc. 1.)
3. Defendants filed their Answer and Counterclaims on December 8, 2023. (See Doc. 7.)

4. This Court entered a Second Amended Scheduling Order (See Doc. 18) on June 24, 2024. Pursuant to this Court's June 24, 2024 Scheduling Order the remaining deadlines are as follows:

Event	Current Deadline
All dispositive and <i>Daubert</i> motions to be filed.	September 2, 2024
Discovery to be completed.	October 1, 2024
Trial docket	December 3, 2024
Designations of deposition testimony to be used at trial.	November 4, 2024
Objections and counterdesignations to be filed.	November 11, 2024
Objections to counterdesignations to be filed.	November 18, 2024
Submission to Court of Depositions to Be Used at Trial	November 25, 2024
Submission to Court of Proposed Orders on Objections to Deposition Designations and Counterdesignations	December 2, 2024
Motions in limine (other than <i>Daubert</i> motions) to be filed.	November 4, 2024
Trial briefs	November 4, 2024
Proposed findings and conclusions of law to be filed no later than	November 4, 2024
Final Pretrial Report	November 4, 2024

5. Since the Court entered the Second Amended Scheduling Order, the parties have engaged in written discovery and taken depositions.

6. Depositions in this case have been delayed, partly due to the parties' schedules and most recently due to a witness contracting COVID the day before his deposition.

7. Plaintiff's counsel took the deposition of Jason Garner on August 14, 2024, and just received the transcript on August 23, 2024. This deposition is vital to Plaintiff's dispositive motion and thus it is imperative that Plaintiff have adequate time to review the transcript before submitting a dispositive motion.

8. During the deposition of Jason Garner it became clear that Plaintiff also needs to depose Shanon Pack, the Town Administrator, before the dispositive motion deadline.

9. The parties are also currently working to resolve discovery disputes amongst themselves.

10. Lead counsel for Plaintiff continues to frequently be out of the office for hearings and depositions due to unforeseen circumstances in other cases.

11. Additionally, the other attorney for Plaintiff has been out of the office for multiple days the past few weeks due to an unforeseen family emergency.

12. For these reasons, the current Scheduling Order is unachievable.

13. Accordingly, Plaintiff requests that the Court extend all deadlines by thirty (30) days in order to allow the parties time to resolve their discovery objections and complete discovery. Given counsel's current schedules, the parties believe thirty (30) days is sufficient time to complete the remaining discovery.

14. On August 22, 2024, Plaintiff's counsel asked Defense counsel if they would object to asking for an extension of the dispositive motion deadline, to which Defense counsel responded that they would not. Plaintiff's counsel contacted Defense counsel again to ask if they would object to a thirty (30) day extension of all deadlines. Plaintiff has not received a response.

15. This is the second request for an extension of time in this matter. The requested extension does necessarily impact the deadlines and trial in this case. This request is not being made for purposes of undue delay, evasion or unfair advantage. Neither the Court nor the parties will be prejudiced by this delay.

16. Accordingly, the Plaintiff proposes that the remaining trial and pretrial deadlines be extended by thirty (30) days as follows:

<i>Event</i>	<i>Current Deadline</i>	<i>New Deadline</i>
All dispositive and <i>Daubert</i> motions to be filed.	September 2, 2024	October 2, 2024
Discovery to be completed.	October 1, 2024	October 31, 2024
Trial docket	December 3, 2024	January 2, 2025
Objections to counterdesignations to be filed.	November 18, 2024	December 18, 2024
Submission to Court of Depositions to Be Used at Trial	November 25, 2024	December 26, 2024
Submission to Court of Proposed Orders on Objections to Deposition Designations and Counterdesignations	December 2, 2024	January 2, 2025
Motions in limine (other than <i>Daubert</i> motions) to be filed.	November 4, 2024	December 4, 2024
Trial briefs	November 4, 2024	December 4, 2024

<i>Event</i>	<i>Current Deadline</i>	<i>New Deadline</i>
Proposed findings and conclusions of law to be filed no later than	November 4, 2024	December 4, 2024
Final Pretrial Report	November 4, 2024	December 4, 2024

17. A proposed Order is being submitted with this Motion.

WHEREFORE, premises considered, all parties, by and through their respective counsel, respectfully move for an Order from this Court extending all deadlines by thirty (30) days, as requested herein.

Respectfully submitted,

s/ Jessica James Curtis
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CERTIFICATE OF SERVICE

I hereby certify that on this August 29, 2024, I electronically transmitted the attached document to the Clerk of Court via the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to all parties that have filed an Entry of Appearance in this matter.

s/ Jessica James Curtis
Jessica James Curtis